

## **REMARKS**

This Preliminary Amendment is concurrently filed with a Request for Continued Examination for the above-identified patent application. In the Final Office Action of 10/19/2007, the Examiner rejected claims 1 and 3-10 under 35 U.S.C. 112, second paragraph, and rejected claims 1, 3-10, and 21-26 under 35 U.S.C. 102(a) as being anticipated by Haas et al. "Personalized News Through Content Augmentation and Profiling," Proceedings of ICIP 02, Rochester, NY, Sept. 2002 (hereinafter Haas). In this Response, Applicants have canceled claims 5, 6, and 8-10 and have added new claims 27-31. Accordingly, claims 1, 3-4, 7, and 21-31 will be pending after entry of this Response.

### **I. Rejections under 35 U.S.C. 112**

In the Final Office Action, the Examiner rejected claims 1 and 3-10 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. In particular, the Examiner indicated that claim 1 limitations "wherein said target device comprise a media player" are ambiguous and unclear. Applicants submit that the 112 rejection is moot in light of claim amendments of the present Response which have deleted "comprise a media player" from claim 1.

### **II. Rejections under 35 U.S.C. 102**

In the Final Office Action, the Examiner rejected claims 1, 3-10, and 21-26 under 35 U.S.C. 102(a) as being anticipated by Haas. Applicants have amended claim 1, and as the rejection might be applied to the amended claim, respectfully traverse. Claim 1 recites a method for implementing a user interface on a client device, the method comprising:

coupling said host computer device, said client device, and at least one target device through a wireless network;  
operating an application program on a host computer device, said application program comprising said user interface to control at least one target device;

transmitting, from said host computer device to a client device, an identification of at least one scene, said scene defines an abstract layout for at least one screen display of said user interface;

generating at least one screen display for said scene based on an interpretation of said scene at said client device;

displaying, on said client device, said screen display of said user interface;

receiving input, at said client device, from a user to initiate at least one operation at said target device; and

performing said operation at said target device in response to control from said client device, wherein said at least one target device and said client device comprise separate devices.

[Emphasis added.]

Haas discloses a set-top box for receiving information from a television broadcast station and the Internet for showing on a display (*see* Figures 2 and 3). Haas, however, does not disclose, teach, or even suggest coupling said host computer device, said client device, and at least one target device through a wireless network, displaying, on said client device, a screen display of a user interface, receiving user input, at the client device, and performing the operation at the target device, wherein said target device comprises a media player, wherein the target device and client device comprise separate devices.

The Examiner indicates that the television broadcast station of Haas corresponds to the host device of claim 1 and the set-top box and display of Haas correspond to the client device of claim 1. The Examiner has also indicated that the personal video recorder (PVR) of Haas corresponds to the target device of claim 1. However, page 1, paragraph 2 of Haas discloses “...a scenario for home consumer viewing, which assumes a set-top box with personal video recorder (PVR) capability, also enabled with Internet access...” As such, as disclosed in Haas, the set-top box and the PVR comprise the same device (i.e., a set-top box that has PVR capability) and not separate set-top box and PVR devices. Thus, Haas does not teach or suggest receiving input at the client device to initiate an operation at a target device, and performing the operation at the target device, wherein the target device and client device comprise separate devices, as required in claim 1.

Further, no where in Haas is it taught or suggested that the host computer device, client device, and the target device are coupled through a wireless network. For example, no where in Haas is it taught or suggested that the set-top box and the PVR are coupled through a wireless network, since, as discussed above, the set-top box and the PVR comprise the same device.

For the above reasons, Applicants submit that claim 1 is in allowable form. Claims 3-4, 7, 21, and 22 are dependent upon claim 1, and thus are allowable for at least the same reasons as claim 1. Further, Haas also does not teach or suggest the additional limitations of claim 3, which recites:

The method as set forth in claim 1, wherein said client device comprises a portable wireless electronic device that includes a graphical display.  
[Emphasis added.]

The Examiner indicates that the set-top box and display of Haas correspond to the client device of claim 1. However, Haas does not teach or suggest that the set-top box and the display are portable or wireless and it is not known in the art for a set-top box and display to be portable or wireless.

Further, Haas also does not teach or suggest the additional limitations of claim 22, which recites:

The method as set forth in claim 1, wherein said wireless network comprises a home network.  
[Emphasis added.]

The Examiner indicates that a home network in Haas is disclosed comprising the set-top box, TV, and TV remote control. Claim 1 of the present application requires that the wireless network couples the host device, client device, and at least one target device. As discussed above, the Examiner has indicated that the television broadcast station of Haas corresponds to the host device, the set-top box and TV of Haas correspond to the client device, and the PVR of Haas corresponds to the target device of claim 1. Haas, however, does not teach or suggest that the television broadcast

station is coupled to the set-top box and TV through a home network (which is obvious since a television broadcast station is clearly not part of a home network). Nor does Haas teach or suggest that the set-top box and the PVR are coupled through a home network, since, as discussed above, the set-top box and the PVR comprise the same device. The Examiner has not, explained the importance or relevance of the TV remote control of Haas in relation to claims 1 and 22 (for example, whether the TV remote control corresponds to the host device, client device, or target device or any other components of claims 1 and 22).

Independent claim 23 recites a method for implementing a user interface on a client device remote from a host device, said method comprising the steps of:

- operating an application program on said host device, said application program comprising said user interface;

- transmitting, from said host device to a said client device, an identification of at least one scene, said scene defines an abstract layout for at least one screen display of said user interface;

- generating at least one screen display for said scene based on an interpretation of said scene at said client device;

- displaying, on said client device, said screen display of said user interface;
- receiving a first user input, at said client device, to initiate a first operation at a first target device, said first target device comprising a video media player;

- performing said first operation at said first target device;

- receiving a second user input, at said client device, to initiate a second operation at a second target device, said second target device comprising an audio media player; and

- performing said second operation at said second target device, wherein said client device, first target device, and second target device comprise three separate devices.

[Emphasis added.]

As discussed above, Haas does not teach or suggest that the target device and client device comprise separate devices. Claim 23 further requires that the client device, first target device, and second target device comprise three separate devices. Haas also does not teach or suggest these further limitations of claim 23. As such, Applicants submit that claim 23 is in allowable form. Claims 24-26 are dependent upon claim 23, and thus are allowable for at least the same reasons as

claim 23.

### III. New Claims

In this response, Applicants have added claims 27-31. New independent claim 27 recites a method for implementing a user interface on a client device for remotely controlling a target device, the method comprising:

- connecting a host device with said client device using a local home network;
- connecting said client device with said target device using said local home network;
- operating an application program on said host device, said application program comprising said user interface;
- transmitting, from said host device to said client device, at least one screen display of said user interface;
- displaying, on said client device, said at least one screen display of said user interface;
- receiving input, at said client device, from a user to initiate at least one operation at said target device; and
- performing said operation at said target device in response to control from said client device, wherein said target device and said client device comprise separate devices.

[Emphasis added.]

As discussed above, Haas does not teach or suggest that the target device and client device comprise separate devices. Haas also does not teach or suggest connecting a host device with said client device using a local home network. As discussed above, the Examiner indicates that the television broadcast station of Haas corresponds to the host device and the set-top box and TV of Haas correspond to the client device. Haas, however, does not teach or suggest that the television broadcast station is coupled to the set-top box and TV through a local home network (which is obvious since a television broadcast station is clearly not part of a local home network).

As such, Applicants submit that new claim 27 is in allowable form. New claims 28-31 are dependent upon claim 27, and thus are allowable for at least the same reasons as claim 27. Further, Haas also does not teach or suggest the additional limitations of claim 29, which recites:

The method as set forth in claim 28, wherein said client device and said target device are connected to the local home network at different points on the local home network.

[Emphasis added.]

Since the set-top box and PVR of Haas comprise the same device, they can not be connected to a local home network at different points on the local home network.

### **CONCLUSION**

Based on the foregoing remarks, Applicants believe that the application is in condition for allowance. If the Examiner has any questions regarding the case, the Examiner is invited to contact Applicants' undersigned representative at the number given below.

Respectfully submitted,

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